



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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DIVISION OF SOCIAL JUSTICE  
CIVIL RIGHTS BUREAU

July 26, 2022

**By Electronic Filing**

Hon. Gabriel W. Gorenstein, U.S.M.J.  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan Courthouse, 500 Pearl Street  
New York, New York 10007

**Re:** *In re: New York City Policing During Summer 2020 Demonstrations,*  
*No. 20-CV-8924*  
This Letter is Related to All Cases

Dear Judge Gorenstein:

I write on behalf of all plaintiffs in these consolidated cases, pursuant to Dkt. No. 490, to provide a proposed Order regarding agreements reached at a meet and confer on ARGUS footage and the Court's order at ECF No. 541. I sent a prior version of the Proposed Order to Defendants' counsel at 11:57 a.m. on Friday, July 22, 2022, which incorporated previous edits from Defendants. Over 24 hours later, at 2:44 P.M. on Monday, July 25, 2022, Defendants asked Plaintiffs for more time to provide further edits, which they did provide at 6:52 P.M. The attached Proposed Order fully accepted those edits.<sup>1</sup>

We thank the Court for its time and consideration.

Sincerely,

/s/ Lillian M. Marquez

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CC: All counsel of record (via ECF)

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<sup>1</sup> Plaintiffs note that although they worked to obtain the missing ARGUS discovery through the meet and confer process, these agreements are not meant to grant extensions or excuse Defendants' violation of the Court's May 16, 2022 Order.